

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

VOICEAGE EVS LLC,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 19-1945 (CFC)
)	
HMD GLOBAL OY,)	
)	
Defendant.)	
_____)	
VOICEAGE EVS LLC,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 20-810 (CFC)
)	
LENOVO HOLDING COMPANY, INC.,)	
LENOVO (UNITED STATES) INC.,)	
MOTOROLA MOBILITY HOLDINGS,)	
LLC and MOTOROLA MOBILITY LLC,)	
)	
Defendants.)	
_____)	
VOICEAGE EVS LLC,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 20-1061 (CFC)
)	
APPLE INC.,)	
)	
Defendant.)	
_____)	

**DEFENDANTS’ UNOPPOSED MOTION FOR ISSUANCE OF REQUEST
FOR INTERNATIONAL JUDICIAL ASSISTANCE TO THE
QUEBEC SUPERIOR COURT IN CANADA**

Defendants HMD Global Oy (“HMD”), Apple Inc. (“Apple”), and Lenovo Holding Company, Inc., Lenovo (United States) Inc., Motorola Mobility Holdings, LLC, and Motorola Mobility LLC (collectively, “Lenovo,” and together with HMD and Apple, “Defendants”) hereby move¹ for an order issuing the accompanying Request for International Judicial Assistance to the Quebec Superior Court (“Request”) (i.e., letter rogatory) so that Defendants may seek document disclosure in Canada from VoiceAge Corporation and the Université de Sherbrooke regarding the rights of those parties and others to grant licenses to, or otherwise forgive infringement of, the patents asserted by Plaintiff VoiceAge EVS LLC against Defendants in the above-captioned actions.

The Request is intended to procure documentary evidence. Deposition testimony shall be taken pursuant to the Request and used in this Court solely in the event that VoiceAge Corporation or the Université de Sherbrooke decline to produce documents identified in the Request based on Quebec’s *Business Concerns Records Act*, CQLR c D-12.

¹ Defendants are herewith filing identical motions and memoranda of law in all three captioned cases, seeking the issuance of a single letter rogatory applicable to all three cases.

The complete bases for this motion are set forth in Defendants' opening brief in support. Pursuant to D. Del. LR 7.1.1, Defendants have conferred with VoiceAge EVS LLC regarding this motion, and VoiceAge EVS LLC does not oppose the motion. Counsel for VoiceAge EVS LLC have agreed to accept service of the Request on behalf of VoiceAge Corporation to expedite the process of compliance.

NOW, THEREFORE, Defendants respectfully request the Court to grant this motion and issue the Request.

Dated: April 16, 2021

SHAW KELLER LLP

/s/ Nathan R. Hoeschen

John W. Shaw (No. 3362)
Nathan R. Hoeschen (No. 6232)
I.M. Pei Building
1105 North Market Street, 12th Floor
Wilmington, DE 19801
(302) 298-0700
jshaw@shawkeller.com
nhoeschen@shawkeller.com

Attorneys for HMD Global Oy

POTTER ANDERSON & CORROON
LLP

/s/ Bindu A. Palapura

David E. Moore (#3983)
Bindu A. Palapura (#5370)
Stephanie E. O'Byrne (#4446)
Hercules Plaza, 6th Floor
1313 N. Market Street
Wilmington, DE 19801
Tel: (302) 984-6000
dmoore@potteranderson.com
bpalapura@potteranderson.com
sobyrne@potteranderson.com

Attorneys for Defendant Apple Inc.

Respectfully submitted,

MORRIS, NICHOLS, ARSHT &
TUNNELL LLP

/s/ Rodger D. Smith

Jack B. Blumenfeld (#1014)
Rodger D. Smith II (#3778)
1201 North Market Street
P.O. Box 1347
Wilmington, DE 19899
(302) 658-9200
jblumenfeld@morrisnichols.com
rsmith@morrisnichols.com

*Attorneys for Defendants Lenovo
Holding Company, Inc., Lenovo (United
States) Inc., Motorola Mobility
Holdings, LLC and Motorola Mobility
LLC*